

**Ric F. Malik**

Pro Se Defendant

PO Box 756

Vieques, PR 00765

ricmalik3@gmail.com

(787) 530-7799

April 21, 2025

**Karen M. Murray, Esq.**

8 East Main Street

Moorestown, NJ 08057

Email: Kmurray@murraylaw.com

**Warren Wolf**

c/o Goldberg & Wolf, LLC

1949 Berlin Road, Suite 201

Cherry Hill, NJ 08003

Email: wwolf@goldbergwolf.com

**Re: Ric F. Malik v. Earl and Tama Geertgens**

Adversary Proceeding No. 24-00015-ESL

Request for Disclosure Pursuant to Fed. R. Civ. P. 26 and 34

Dear Ms. Murray,

Please find enclosed a formal **Request for Disclosure** pursuant to **Federal Rules of Civil Procedure 26 and 34**, as incorporated by **Bankruptcy Rules 7026 and 7034**, served in connection with the above-referenced adversary proceeding.

This request seeks information reasonably calculated to lead to the discovery of admissible evidence relevant to the claims and defenses in this matter, including:

- Your professional liability (malpractice) insurance information;
- Your fee agreements with the plaintiffs;
- Documents and reports from private investigators or delivery services; and
- All subpoenas issued or served in this or related litigation.

**In accordance with Rule 26(g), I affirm that this discovery request is made in good faith**, is not unduly burdensome, and is proportional to the needs of this case. You are requested to provide full responses and responsive documents within **fourteen (14) days** of service of this letter and accompanying request.

If you object to any portion of the request, I ask that you clearly state the specific basis for your objection and identify whether responsive materials are being withheld. If no timely or adequate response is received, I reserve the right to move to **compel disclosure under Rule 37**, including a request for costs and sanctions.

**RECEIVED AND FILED  
PRO SE UPLOAD TOOL  
04/23/2025 - 11:29 AM  
USBC  
(WRT)**

Should you believe a conference would assist in resolving any perceived dispute in good faith, I am willing to meet and confer by phone or in writing within the response period.

This letter and its enclosures are served via [Certified Mail / CM/ECF / Email] and filed in accordance with applicable court rules.

Respectfully,

**Ric F. Malik**  
Pro Se Defendant

A handwritten signature in black ink, appearing to be 'RM', written over the typed name and title.

Enclosure:

- Request for Disclosure to Plaintiffs' Counsel – Karen M. Murray, Esq.

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF PUERTO RICO**

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**IN RE:**

**RIC F. MALIK**, Debtor

Chapter 7

Case No. 23-03241-ESL7

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**EARL AND TAMA GEERTGENS**,

Plaintiffs,

v.

**RIC F. MALIK**,

Defendant.

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**Adversary Proceeding No. 24-00015-ESL**

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**DEFENDANT'S FIRST REQUEST FOR DISCLOSURE TO PLAINTIFFS' COUNSEL,  
KAREN M. MURRAY, ESQ.**

**Karen M. Murray, Esq.**

Pursuant to Federal Rules of Civil Procedure 26 and 34, made applicable to this proceeding by Federal Rules of Bankruptcy Procedure 7026 and 7034, and in the interest of full and fair discovery in this adversary proceeding, Defendant **Ric F. Malik**, pro se, respectfully requests that **Karen M. Murray, Esq.**, as counsel for Plaintiffs, produce the following within fourteen (14) days of service:

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**1. Professional Liability (Malpractice) Insurance Information**

Whether you currently maintain professional liability insurance (malpractice insurance) in connection with your legal representation of Earl and Tama Geertgens.

If so, identify:

- a. The name and address of the insurance company or carrier;
- b. The policy number;
- c. The effective dates of coverage;
- d. The coverage limits;
- e. Whether any reservations of rights have been issued concerning this matter; and
- f. Whether any claims have been filed under the policy related to your representation in this case or any related litigation.

If you do not currently maintain malpractice insurance, please state so expressly.

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## **2. Fee Agreements with Plaintiffs**

Produce all documents reflecting or relating to any **agreements for legal representation or compensation** between you and your clients, Earl and Tama Geertgens, including but not limited to:

- a. Retainer or contingency agreements;
  - b. Hourly billing agreements or fee schedules;
  - c. Amendments, addenda, or modifications to such agreements;
  - d. Billing statements or itemized invoices from 2021 to present.
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## **3. Agreements and Materials from Private Investigators and Delivery Services**

Produce **all agreements, communications, and deliverables** from any **private investigator, process server, or third-party vendor** retained by you or your clients in this adversary proceeding or related litigation, including but not limited to:

- a. Retainer agreements or engagement letters with any investigator or delivery service;
- b. Invoices, time logs, or billing records associated with surveillance or service of process;
- c. Copies of all reports prepared by such investigators or agents;
- d. All supporting documentation relied upon to generate those reports, including:
  - Photographs, video recordings, or audio recordings;
  - Notes, observations, or internal memoranda;
  - Communications between you and the investigator or process server;
  - Location logs or tracking records;
  - e. Any correspondence with third-party agents relating to surveillance or delivery attempts concerning the Defendant or his associates.
  - All documents, reports, communications, or media evidencing surveillance or physical observation of Andrew Mali or Ric Malik, including any visits to construction sites, customer locations, or business addresses between January 1, 2023, and the present.

This request is made to identify the scope and basis of surveillance, service attempts, and related investigations referenced or implied in this proceeding, and to allow for full and fair opportunity to evaluate, challenge, or rebut their use.

## **4. Subpoenas Issued by Plaintiffs' Counsel**

### **REQUEST NO. 4.1:**

Produce a true and correct copy of each and every subpoena issued, authorized, prepared, or served by you, your agents, or any third party acting on your behalf, in connection with:

- The present New Jersey civil action (Docket No. BUR-L-1741-23);

- The related federal bankruptcy case *In re Ric F. Malik*, Case No. 23-03241-ESL7 (U.S. Bankruptcy Court, District of Puerto Rico); and
- The related adversary proceeding *Geertgens v. Malik*, Adv. Proc. No. 24-00015-ESL.

This request specifically includes, but is not limited to:

- Any subpoenas directed to financial institutions, government agencies, process servers, vendors, or third-party individuals;
- Any Rule 45 subpoenas in the adversary proceeding;
- Any Rule 2004 examination subpoenas issued in the bankruptcy case;
- All certificates of service, returns of service, or correspondence related to such subpoenas.

You are further requested to produce all documents, records, logs, or proof of delivery or acknowledgment related to such subpoenas.

**Relevance Statement:**

This request is made for the purpose of identifying undisclosed third-party surveillance, investigation, or ex parte information-gathering conducted by Plaintiff's counsel or agents, which may have prejudiced Defendant's rights, violated discovery protocols, or contributed to improper litigation tactics. These documents are essential to evaluate potential claims for abuse of process, harassment, or violations of applicable discovery rules.

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**Respectfully submitted,**

Ric F. Malik  
Pro Se Defendant  
PO Box 756  
Vieques, PR 00765  
ricmalik3@gmail.com  
787-530-7799



Dated: April 23, 2025

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF PUERTO RICO**

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**IN RE:**

RIC F. MALIK, Debtor

Chapter 7

Case No. 23-03241-ESL7

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**EARL AND TAMA GEERTGENS,**  
Plaintiffs,

v.

**RIC F. MALIK,**  
Defendant.

Adversary Proceeding No. 24-00015-ESL

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**NOTICE OF INTENT TO ENFORCE DISCOVERY**

TO THE HONORABLE COURT AND TO ALL PARTIES AND COUNSEL OF RECORD:

COMES NOW the Defendant, **Ric F. Malik**, appearing **pro se**, and hereby respectfully gives notice of his intent to enforce discovery rights in the above-captioned adversary proceeding.

On [insert date], the undersigned served on **Plaintiffs' counsel, Karen M. Murray, Esq.**, a formal **Request for Disclosure** pursuant to **Fed. R. Civ. P. 26 and 34**, as incorporated by **Fed. R. Bankr. P. 7026 and 7034**. The request seeks the production of documents and information relevant to the issues in this proceeding, including:

- The existence and scope of any professional liability (malpractice) insurance carried by counsel;
- Agreements for compensation or representation between Plaintiffs and their counsel;
- All documents, agreements, and reports from private investigators, process servers, or other agents retained by Plaintiffs or their counsel;
- Copies of all subpoenas issued or served in connection with this or any related litigation.

These requests are narrowly tailored, proportional, and served in good faith in accordance with **Rule 26(g)**. Plaintiffs' counsel has been afforded **fourteen (14) days to respond**, in line with standard practice.

Should Plaintiffs' counsel fail to respond, respond inadequately, or refuse to produce the requested documents without proper objection or legal justification, the undersigned **intends to move this Honorable Court** for:

1. **An order compelling disclosure** pursuant to Fed. R. Civ. P. 37(a);
2. **Sanctions**, including reasonable costs and fees pursuant to Fed. R. Civ. P. 37(b), if warranted; and
3. Such further relief as the Court deems just and proper.

This Notice is filed to place all parties on record and to demonstrate the undersigned's commitment to diligent and timely prosecution of all claims and defenses under the applicable discovery rules.

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**Respectfully submitted,**

Ric F. Malik  
Pro Se Defendant  
PO Box 756  
Vieques, PR 00765  
ricmalik3@gmail.com  
787-530-7799



Dated: April 22, 2025